



7/14/17

U.S. Environmental Protection Agency
Contract Management Division
26 W. Martin Luther King Drive
Cincinnati, OH 45268

Attention: Lisa Mitchell-Flinn

Subject: Contract No. EP-C-15-022, WA 2-94
Work Plan and Budget

Dear Lisa:

Enclosed please find the work plan and budget for the above-referenced Work Assignment. The period of performance for this Work Assignment is from 7/7/17 through 6/30/18. Below is a summary of the funding for the project under this work assignment.

Work Assignment	Work Plan Hours	Work Plan Cost	Work Plan Fee	Work Plan Dollars
2-94	460	\$34,663.36	\$2,778.40	\$37,441.76
Total	460	\$34,663.36	\$2,778.40	\$37,441.76

The Cadmus Program Manager for this contract is Frank Letkiewicz; Anna Weber will serve as the Cadmus Project Manager for this Work Assignment. A Conflict of Interest Certification is included with the enclosed work plan.

Please note that the attached work plan contains a tailored QASP for your consideration.

Copies of this submission have been sent to the Project Officer and Contracting Officer's Representative. If you need any additional information or have any questions, please do not hesitate to contact me at the below number.

Sincerely,

Joel DeMasi
Contracts Manager

copy to: Nancy Parrotta, Project Officer
Bruce Suchomel, Work Assignment Contracting
Officer's Representative

Work Plan

***Organizing Dewey-Burdock's Public Comments
(for the Region 8 Proposed Dewey-Burdock In-Situ Uranium Recovery Project)***

**Contract No. EP-C-15-022
Work Assignment No. 2-94**

Period of Performance: July 7, 2017 – June 30, 2018

Prepared for:

**Ms. Nancy Parrotta, Project Officer
Mr. Bruce Suchomel, Work Assignment Contracting Officer's Representative
U.S. Environmental Protection Agency
Office of Ground Water and Drinking Water
1201 Constitution Ave, NW, EPA East
Washington, DC 20460-0003**

Prepared by:

**The Cadmus Group, Inc.
100 5th Avenue, Suite 100
Waltham, MA 02451-8727**

Contract No. EP-C-15-022
Work Assignment No. 2-94
Organizing Dewey-Burdock's Public Comments
(for the Region 8 Proposed Dewey-Burdock In-Situ Uranium Recovery Project)

1.0 INTRODUCTION

The EPA Region 8 Underground Injection Control (UIC) Program has recently proposed three actions related to the Dewey-Burdock in-situ uranium recovery project located near Edgemont, South Dakota: (1) a draft Class III area permit specifying the conditions for injection of fluid into uranium ore zones; (2) a proposed aquifer exemption for the Class III injection areas; and (3) a draft Class V area permit to dispose of treated waste fluids from the uranium mining operations. A comment period for the draft permits and proposed aquifer exemption, along with supporting materials from the associated administrative records, began on March 6, 2017 and closed on June 19, 2017. EPA also held five public hearings during April and May 2017.

As of early June 2017, EPA had received over 8,000 public comments, in addition to testimony from the five public hearings. These public comments include original, unique comments submitted by individuals via email/postal mail or at the public hearings, as well as standardized "template" emails sent as part of an online mass-mailer campaign. Under this work assignment, Cadmus will support EPA by compiling all comments received by EPA into a single document to be posted on EPA's website and by categorizing the comments and testimonies using an organizational scheme developed in coordination with EPA, so that EPA Region 8 personnel can properly manage and address the comments.

2.0 TECHNICAL APPROACH

Task 0: Work Plan and Budget¹

Cadmus is submitting this work plan and budget as a requirement of this task. The work plan includes a proposed schedule of deliverables, a staffing plan, and a description of the tasks outlined under this work assignment. Cadmus will also prepare and submit monthly technical and financial progress reports to the EPA Work Assignment Contracting Officer's Representative (WACOR) under this task.

Cadmus understands that, because the scope of work does not involve the use of primary or secondary data, no supplemental quality assurance project plan (SQAPP) is required for this work assignment.

Estimated Labor Hours for Task 0: 45

Task 1: Compiling all the written public comments received by the EPA on the UIC proposed actions into one document

Under this task, Cadmus will compile all of the public comments into a single, searchable PDF document suitable for posting on EPA's website. This document will include all of the written comments submitted to EPA via both hard copy and email, including written comments provided at the public hearings, but excluding the testimonies from the public hearings and any attachments provided by individual commenters. Per EPA direction received on July 13, 2017, Cadmus will redact the names of

¹ This task was omitted from the Performance Work Statement for this work assignment and was added to the work plan by Cadmus.

individual commenters in this document (for comments submitted by private individuals only, not comments submitted by companies or organizations).

As part of the public comment process on the draft permits and proposed aquifer exemption, EPA received several thousand standardized emails as part of an online mass-mailer campaign. Cadmus understands that most of these emails follow the standardized template developed for the campaign. However, some commenters modified the template language and/or added their own content. Upon receipt of the comment emails from EPA, Cadmus will review each comment to identify whether it follows the standardized template (the text of which is provided below).

Cadmus understands that the template for the mass email is as follows:

Dear EPA,

Thank you for the opportunity to comment on the Underground Injection Control Program's Draft Permits for the Proposed Dewey-Burdock Uranium Mine and Deep Disposal Wells.

The proposed mine and deep disposal wells are in an area that is documented to have faults, fractures, breccia pipes, and over 7000 old boreholes that have not been properly plugged. It will be impossible to contain mining fluids or waste liquids, and contamination of groundwater resources is very likely.

I am also concerned that adequate oversight of the quality of liquid wastes pumped into the Minnelusa Formation through the proposed deep disposal wells will be inadequate, and groundwater is likely to be contaminated.

A full survey of cultural and historical sites is needed before mining or deep disposal is allowed. Cultural and historical sites must be protected.

The history of uranium mining indicates that uranium mining cannot be done without creating and leaving contamination. Groundwater has never been returned to its original condition at any In-Situ leach uranium mine in the U.S. These permits should not be issued until it can be demonstrated that groundwater resources will be protected.

If Cadmus determines that a commenter modified the template and/or added original material, Cadmus will include the edited/additional content in the document of compiled comments.

For estimation purposes, Cadmus assumes that there will be approximately 2,000 pages of written comments and up to 10,000 mass-mailer emails, and that these will be provided to Cadmus in an electronic format by EPA. If directed by EPA, Cadmus will ensure that the final, compiled document is compliant with the appropriate Section 508 accessibility requirements before submitting it to EPA.

Estimated Labor Hours for Task 1: 80

Task 2: Categorization of all the public comments received by the EPA on the UIC proposed actions in one document

Under this task, Cadmus will organize the public comments compiled under Task 1 and the public hearing testimonies into categories reflecting the comments' topic areas. For estimation purposes, Cadmus assumes that there will be approximately 840 pages of public hearing testimonies, in addition to the written comments described under Task 1.

Upon completion of Task 1 and receipt of the proposed categories from EPA, Cadmus will begin organizing the comments into categories in one Microsoft Word file. Cadmus will review each comment and identify the appropriate category or categories for each comment (or section, paragraph, or sentence within a comment, as appropriate). Cadmus will organize the deliverable into sections based on the categories and indicate the commenter's name associated with each paragraph/sentence that has been included in a given category. The exact formatting/organization of the deliverable will be determined in coordination with EPA, with the goal of identifying the most efficient way to generate the document and to support EPA's ultimate review of the comments. Regardless of how the document is formatted, Cadmus will clearly identify the topic headings for each category.

Cadmus understands that the proposed categories were generated by EPA based on early comments received and topics raised during the public hearings. As work under Task 2 proceeds, Cadmus may identify additional categories or split existing categories into subcategories to better reflect the content of the comments and most efficiently organize them. Cadmus will notify EPA of any proposed changes to the categorization scheme. For estimation purposes, Cadmus assumes that there will be up to 50 categories total.

As part of the Task 2 work, Cadmus will participate in two check-in conference calls or web conferences with EPA. Before or during each of these meetings, Cadmus will share an interim draft of the deliverable with EPA so that EPA has an opportunity to preview the document.

Cadmus understands that the Task 2 deliverable will be an internal file for use by EPA and will not require Section 508 compliance.

Estimated Labor Hours for Task 2: 335

3.0 SCHEDULE AND DELIVERABLES

The period of performance for this work assignment is from July 7, 2017 to June 30, 2018. A schedule for this work assignment is shown below. Cadmus will notify the WACOR immediately if, at any time, it determines that the schedule will not be met for any reason.

Deliverable	Date
Task 0: Work Plan and Budget²	
Work Plan and Budget	July 27, 2017
Technical Progress Reports	Monthly
Task 1: Compiling all the written public comments received by the EPA on the UIC proposed actions into one document	
Adobe Acrobat PDF word-searchable document containing all written comments	Within 20 business days of receipt of the comments from EPA ³

² This task was omitted from the Performance Work Statement for this work assignment and was added to the work plan by Cadmus.

³ This deliverable date was omitted from the Performance Work Statement for this work assignment and was added by Cadmus to reflect the description provided for Task 1.

Deliverable	Date
Task 2: Categorization of all the public comments received by the EPA on the UIC proposed actions in one document	
Microsoft Word document containing all of the written and transcript comments separated out by topic	Within 50 business days after the start of the work assignment
Web conference/conference call	Within 15 business days after the start of Task 2 ⁴
Web conference/conference call	Within 30 business days after the start of Task 2 ⁴

4.0 PERSONNEL

Ms. Anna Weber, a Cadmus Associate, will manage this work assignment. Ms. Weber has eight years of experience supporting UIC Program projects at Cadmus, including supporting the technical review of Class VI permit applications and evaluating aquifer exemptions for Class II wells in California. She has contributed to the development of multiple Class VI technical guidance documents, performed background research to support EPA’s Class VI rulemaking process, and co-authored a white paper summarizing major geologic sequestration pilot projects. Ms. Weber has also supported the comment-response process for several EPA rulemakings, guidance documents, and permitting decisions. Ms. Weber holds a bachelor’s degree in the geosciences from Williams College and a master’s degree in public health (with a focus on environmental health science and policy) from the George Washington University.

Mr. Frank Letkiewicz, a Cadmus Principal, is the Cadmus Program Manager for this contract, and will provide technical senior review and contractual oversight with the EPA Project Officer. Mr. Letkiewicz has 40 years of experience as an environmental scientist specializing in projects involving health effects assessments, exposure assessments, and environmental policy analysis.

Ms. Donna Jensen, a Cadmus Principal, is the Cadmus Quality Assurance Manager for this contract and will be responsible for ensuring the full implementation of all applicable QA activities required under this work assignment and as provided in the Cadmus Quality Management Plan.

Dr. Maryam Akhavan, a Cadmus Associate, will provide senior technical support and QA under this work assignment. Dr. Akhavan has more than 7 years of experience in hydrogeology and subsurface/ground water flow and solute transport modeling. She has assisted with the development of technical guidance documents for Class VI injection wells, contributed to technical evaluations of UIC permit applications across multiple wells classes, and is experienced in developing and applying computational models such as STOMP to delineate the area of review for Class VI injection projects. Dr. Akhavan received a PhD in environmental engineering.

Mr. Braden Rosenberg, a Cadmus Associate, will provide technical support under this work assignment. Mr. Rosenberg has a background in geology and environmental science. Mr. Rosenberg has provided support to EPA in evaluating permit applications for Class VI injection wells and has been involved in the development and optimization of Class VI reporting guidance and templates for well operators. Additionally, Mr. Rosenberg has provided technical support for aquifer exemption determinations as part of EPA’s UIC Program and has performed literature review and analysis for

⁴ Specific date to be determined in consultation with the WACOR.

hydraulic fracturing assessments and background documents. Prior to joining Cadmus, Mr. Rosenberg was a field geologist for oil and gas exploration and production wells in the western United States.

Ms. Ava Lazor, a Cadmus Analyst, will provide technical support under this work assignment. She has contributed to various UIC Program efforts including reviews of aquifer exemption requests and evaluations of injection well permit applications. Ms. Lazor holds bachelor's degrees in geology and economics from the George Washington University.

Ms. Shari Ring, a Cadmus Senior Associate, will provide quality assurance review for all deliverables on this work assignment. Ms. Ring will report directly to the QA Manager for this contract and not to the Cadmus Project Manager.

All other personnel listed in the budget will provide research and analysis support or will perform contract and/or accounting functions.

5.0 RISK MANAGEMENT STRATEGY

In coordination with the WACOR, Cadmus will support EPA in carrying out the various activities identified in this work plan. If EPA requires significant changes in Cadmus' technical approach or if the magnitude of the comments received are greater than that projected in this work plan, additional labor hours and funding may be required. In addition, Cadmus' ability to meet the schedule set forth in this work plan is contingent upon timely receipt of comments and feedback from EPA.

Because there may be unforeseen aspects of this work assignment, Cadmus will maintain close and constant communication with the WACOR to discuss any problems as they arise, following the procedures identified in the Quality Assurance Surveillance Plan (Section 7.0).

6.0 BUDGET

This work plan reflects the professional labor hours that are needed to perform the tasks under this work assignment. The budget for this work assignment is attached and reflects the total level of funding Cadmus estimates will be necessary to perform the work described in this work plan.

7.0 QUALITY ASSURANCE SURVEILLANCE PLAN

Performance Requirements	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives
<p>Programmatic Requirement: <u>Outreach and Communication</u> Cadmus will develop and disseminate outreach and communication products that have the effect on the audience that is desired by EPA.</p>	<p>Cadmus will develop outreach and communication products on the basis of a plan that identifies the intended audiences, the media and distribution channels appropriate to those audiences, and the desired behavioral or other outcomes. If directed by the WACOR, Cadmus will implement a system for evaluating the impact of the products or campaigns on the intended audience(s).</p>	<p>The WACOR will verify that an appropriate outreach and communication plan has been developed and that final products are consistent with the plan. The WACOR will review the results of the evaluation effort, if any, to determine whether the products or campaigns had the desired effect.</p>	<p>More than two work assignments per contract period where the contractor does not meet the measurable performance standard will be considered unsatisfactory performance and will be reported as such in the CPARS Performance Evaluation System under the category of Management.</p> <p>Two or fewer work assignments per contract period where the contractor does not meet the measurable performance standard will be considered satisfactory performance and will be reported as such in the CPARS Performance Evaluation System under the category of Management.</p>

Performance Requirements	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives
<p>Cost Control Standard: The Cadmus Project Manager will monitor project status and will provide monthly progress reports indicating the level of budget utilized and estimating the budget needs for the upcoming reporting period. Cadmus will identify the QA measures undertaken in each reporting period through the monthly progress reports. Cadmus will maintain close communication with the WACOR regarding project and budget status and will notify the WACOR immediately in cases where issues impacting project cost are identified. As needed, Cadmus will work with the WACOR to develop a risk management strategy to identify and address any specific project element(s) that adversely impact the proposed work plan. This strategy will identify the risks associated with failure to resolve the issue(s). Cadmus will work with the WACOR to assess and prioritize any remaining tasks and develop an analysis of alternative solutions.</p>	<p>The Cadmus Project Manager will manage costs to the level of the approved ceiling on each individual WA. The Cadmus Project Manager will notify the EPA WACOR and the Cadmus Program Manager will notify the EPA Project Officer and EPA Contracting Officer when 75% of the approved funding ceiling for any particular WA is reached.</p>	<p>The EPA Project Officer will routinely discuss the work progress and contract level and individual work assignment expenditures with the Cadmus Program Manager. The WACOR will maintain regular contact with Cadmus' designated Project Manager to discuss progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.</p>	<p>If the contractor does not meet the measurable performance standards per work assignment per contract period it will be assigned a rating of Unsatisfactory in CPARS under the category of Cost Control.</p> <p>A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of Cost Control if the contractor meets the measurable performance standards and accurately reports the costs in the progress reports according to the requirements in the "Reports of Work" attachment to the RFP.</p>

Performance Requirements	Measurable Performance Standards	Surveillance Methods	Incentives/Disincentives
<p>Schedule Standard: Cadmus will provide services and submit deliverables in accordance with approved work assignment milestones and deliverable schedules. The Cadmus Project Manager will notify the WACOR immediately if, at any time, it determines that the schedule will not be met for any reason.</p>	<p>Cadmus will adhere to the schedule of deliverables established in Section 3.0. Cadmus and the WACOR will establish revised deliverable due dates as needed, through technical direction. Cadmus will maintain close communication with the WACOR throughout the period of performance. Unless a schedule or milestone is amended or modified by an approved EPA action, a deliverable that is received 7 days past the due date will be considered unsatisfactory performance for that deliverable.</p>	<p>EPA will closely monitor work assignment milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in work assignments or as amended by technical direction. EPA will notify Cadmus when it becomes apparent that an established schedule will not be met.</p>	<p>If the contractor does not meet the measurable performance standards more than twice per work assignment per contract year it will be assigned a rating of Unsatisfactory in CPARS under the category of Schedule.</p> <p>A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of Schedule if the contractor meets the measurable performance standards.</p>
<p>Document Development: Cadmus will provide documents that are technically and factually accurate, and suited to the intended audience.</p>	<p>Products intended for publication by EPA will be developed using the processes and requirements included in the most up to date EPA or OW publication guidance document. Information to be disseminated by EPA will meet the requirements of the QMP and contract-level QAPP and, if applicable, the supplemental QAPP for the WA.</p>	<p>The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will collate all comments by EPA and external reviewers of draft documents and will provide Cadmus with a consistent list of all inaccuracies and needed edits and corrections in the initial review of draft documents.</p>	<p>If the contractor does not meet the measurable performance standards per work assignment per contract year it will be assigned a rating of Unsatisfactory in CPARS under the category of Technical (Quality of Product).</p> <p>A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of Technical (Quality of Product) if the contractor meets the measurable performance standards.</p>

EPA Contract EP-C-15-022
EPA Work Assignment No. 2-94
Period of Performance: July 7, 2017 - June 30, 2018
Organizing Dewey-Burdock's Public Comments (for the Region 8 proposed Dewey-Burdock in-situ uranium recovery project)

DIRECT LABOR			
<u>Full-Time Labor</u>	<u>Hours</u>	<u>Total</u>	<u>Est. Cost</u>
Professional Level 4	74		
Professional Level 3	96		
Professional Level 2	124		
Professional Level 1	166		
<u>Part-Time Labor</u>			
Professional Level 4	-		
Professional Level 3	-		
Professional Level 2	-		
Professional Level 1	-		
	<u>460</u>	<u>\$32,444.56</u> ^a	<u>\$32,444.56</u> ^a
OTHER DIRECT COSTS	<u>Quantity</u>	<u>Total</u> ^b	
IT & Telecom (Per Labor Hour)	460 Hours	\$2,180.40	
Delivery (Packages)	4 Packages	\$38.40	
Meeting Space	- Days	\$0.00	
Audio/Visual/etc.	- Days	\$0.00	
			<u>\$2,218.80</u> ^b
TRAVEL	<u>Quantity</u>	<u>Total</u> ^c	
Airfare	- Trips	\$0.00	
Ground	- Trips	\$0.00	
Lodging	- Trips	\$0.00	
Meals	- Trips	\$0.00	
Local Travel	- Trips	\$0.00	
			<u>\$0.00</u> ^c
Subcontractors	<u>LOE</u>	<u>Total</u> ^d	
	- Hours	\$0.00	
	- Hours	\$0.00	
	- Hours	\$0.00	
	- Hours	\$0.00	
	- Hours	\$0.00	
	<u>-</u>	<u>\$0.00</u>	<u>\$0.00</u> ^d
Intersegment Cadmus Labor	<u>LOE</u>	<u>Total</u>	
	- Hours	\$0.00	
	- Hours	\$0.00	
	<u>-</u>	<u>\$0.00</u>	<u>\$0.00</u>
Total Cost			<u>\$34,663.36</u>
Fixed Fee	\$6.04 per hour		\$2,778.40
Total Cost + Fixed Fee			<u>\$37,441.76</u>
Total Hours			<u>460</u>
Average Hourly Rate			\$81.40

^a Direct Labor figures include Overhead, Fringe and G&A
^b Other Direct Costs figures include G&A
^c Travel figures include G&A
^d Subcontractors/Consultants figures include Material Handling

CERTIFICATION CONCERNING CONFLICTS OF INTEREST
THE CADMUS GROUP, INC.

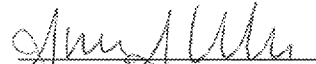
Contract No.: EP-C-15-022

Work Assignment No.: 2-94

In accordance with Cadmus' Conflict of Interest (COI) plan and the above cited contract, The Cadmus Group, Inc. (Cadmus) is required to include a certification concerning potential conflicts of interest with the submission of each work plan. Before submitting the conflict of interest certification, Cadmus shall search its records accumulated, at a minimum, over the past three years immediately prior to the receipt of the work assignment or similar tasking document. Since services are being provided under the above cited contract, you are required to certify to the following.

1. ORGANIZATIONAL CONFLICTS OF INTEREST:

- a) To the best of your knowledge and belief, no actual or potential organizational conflicts of interest exist.

Signature: 

Date: 7/11/17

Typed Name: Anna Weber

***** COMPLETE EITHER a. OR b. *****

- b) To the best of your knowledge and belief, all actual or potential organizational conflicts of interest have been reported to The Cadmus Group, Inc. Please attach a letter detailing such actual or potential conflicts of interest, and the steps you propose to mitigate or avoid them.

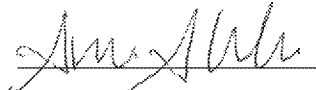
Signature: _____

Date: _____

Typed Name: _____

2. PERSONNEL CONFLICTS OF INTEREST:

This is to certify that personnel who perform work under the work assignment, or relating to the work assignment, have been informed of their obligation to report personal and organizational conflicts of interests to you. Attach a letter detailing any personnel conflicts of interest, if any.

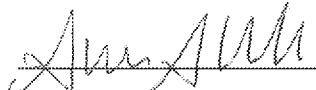
Signature: 

Date: 7/11/17

Typed Name: Anna Weber

3. FUTURE CONFLICTS OF INTEREST:

This is to certify that you will promptly report to The Cadmus Group, Inc. any organizational or personnel conflicts of interest that may arise during the performance of this work assignment.

Signature: 

Date: 7/11/17

Typed Name: Anna Weber